

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ALISON VALENTE, JENNIFER
BARLOW, KATHRYN MONROE,
SOPHIA SMITH, STEPHANIE
LEBEAU on behalf of
themselves and all others
similarly situated,

CIVIL ACTION
FILE NO.
1:15-CV-02477-ELR

Plaintiffs,

vs.

INTERNATIONAL FOLLIES, INC.,
d/b/a THE CHEETAH and WILLIAM
HAGOOD,

Defendants.

DEPOSITION OF

SAMANTHA LEIGH KIM

Monday, October 30, 2017

1:39 p.m.

Suite 2700
260 Peachtree Street
Atlanta, Georgia

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ORIGINAL

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ORIGINAL

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Plaintiff's Exhibit	Description	Page
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(Original Exhibit 1 has been attached to the original transcript.)

(Reporter disclosure made pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia.)

SAMANTHA LEIGH KIM,
having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. DUDLEY:

Q. Samantha, how are you today, or this afternoon?

A. Doing all right, sir. Yourself?

Q. I am doing good. I won't introduce myself. We met before.

You have testified several times on behalf of Cheetah, have you not?

A. I have. I think this is my third.

Q. Other than the hearings that were conducted back in 2015, have you done any depositions on behalf of Cheetah?

A. Yes.

Q. Which ones have you done? Let me rephrase that. When did you do depositions?

A. I believe I had a limited scope FLSA deposition in July of last year.

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1 Q. Okay.

2 A. And I represented the club as a 30(b)(6)
3 witness in July of this year. I believe it was July.

4 Q. The one in July, was that in the Title VII
5 case?

6 A. No, sir.

7 Q. Was it in a RICO case?

8 A. No, sir. It was unrelated to the Valente
9 case.

10 Q. It was another FLSA case?

11 A. No, sir. It was not FLSA.

12 Q. Can you tell me what it was about?

13 A. It had to do with a customer leaving the
14 club and being in an accident.

15 Q. Personal injury case?

16 A. I believe so.

17 Q. Tell me how long you've worked for
18 Cheetah.

19 A. In different roles since 2000.

20 Q. Tell me all the roles you have had at
21 Cheetah since 2000 in chronological order if you can.

22 A. Makeup artist. Front door hostess.
23 Relief manager. Nightshift housemom. Daytime
24 manager.

25 Q. When were you nightshift relief manager

1 roughly?

2 A. I was a dayshift relief manager.

3 Q. Sorry.

4 A. It was, I believe, 2005.

5 Q. 2005 only or did it -- is that when you
6 started doing it?

7 A. I believe it was only in the year 2005.
8 It was maternity relief.

9 Q. And you have been the dayshift manager
10 since 2005?

11 A. No, sir. Since 2011.

12 Q. That's what I was asking. What did you do
13 between 2005 and 2011?

14 A. Front door. Dayshift management relief.
15 Nightshift housemom relief.

16 Q. What are your duties as dayshift manager?

17 A. I check in the girls as they arrive and
18 create the daily rotation. I watch the floor. I
19 manage the bar staff and the wait staff as well as
20 ordering liquor and paper goods. I organize
21 maintenance, landscaping, cleaning crew. Chemical
22 goods. AC repair. Help to sell Cheetah Bucks.

23 Q. Anything else?

24 A. Train girls when they are new. Hire wait
25 staff, bar staff when necessary.

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1 I think that's it. I have my fingers in a
2 lot of pots.

3 Q. You do.

4 When you say order liquor, I understand
5 that. What do you mean by paper goods?

6 A. Bev naps, paper cups, straws, stirrers.

7 Q. Are you responsible for entertainers
8 checking in or does the dayshift housemom handle that?

9 A. I am also the dayshift housemom working as
10 manager.

11 Q. Are you the only housemom on duty during
12 dayshift?

13 A. If I am there, generally, yes. I have a
14 relief manager that works on Saturdays.

15 Q. Would it be a true statement to say that
16 your primary duties during the day are the manager and
17 the housemom?

18 A. Yes. I fill both roles.

19 Q. So would you agree with the statement that
20 you check in the entertainers -- and again, I am
21 asking you about before April 9th, 2016, then I will
22 ask you some questions after that. Until you hear
23 otherwise I am asking about before April 9th, 2016.

24 A. Okay.

25 Q. During that period of time, you handled

1 the check-in of entertainers, right?

2 A. Yes.

3 Q. And you handled the stage rotation.

4 A. Yes.

5 Q. And you do the checkout process.

6 A. Yes.

7 Q. Did you Breathalyze before April 9th,
8 2016?

9 A. For some years before April 9th, 2016, I
10 had a floorman that would Breathalyze. He came in at
11 4:00. For some years I did not. It is fair to say
12 that I have done the Breathalyzer as part of my
13 checkout duty and there was a time I had a floorman
14 who did it.

15 Q. Are you doing the Breathalyzer now?

16 A. Yes.

17 Q. Do you know why the housemoms are now
18 doing the Breathalzying as opposed to floormen? Is
19 there a reason for it?

20 A. I as a housemom do the Breathalyzer as the
21 floorman because I do not have a floorman.

22 Q. Do you know why they changed the person
23 responsible for doing Breathalyzers at nightshift?

24 A. I do not.

25 Q. You handle scheduling for dayshift?

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1 A. Yes, sir.

2 Q. You are the person that would deal with
3 covers on behalf of entertainers during dayshift?

4 A. The entertainers themselves are
5 responsible for getting covers.

6 Q. But you would be responsible for keeping
7 track of who was using a cover and who was covering?

8 A. Yes.

9 Q. You would be notified of that and you
10 would keep track of it?

11 A. I would be notified when the cover
12 arrived, if she was there to work for whoever.

13 Q. Did you keep a written list of people who
14 were being covered and those who were covering?

15 A. It is on our daily, but that's it.

16 Q. Your daily what?

17 A. The daily schedule.

18 Q. Tell me what all is on the daily schedule.

19 A. The date. The name of the housemom who
20 was working. The color of the rotation that they
21 would start on for that day and the girls who are
22 scheduled. Then you would write in your own
23 handwriting girls who just came in to work extra.

24 Q. How would I tell on this form who was a
25 cover and who was being covered?

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1 A. I am sorry, on what form?

2 Q. The form you are talking about.

3 A. If they are scheduled, they are printed on
4 the form. If they are not scheduled, then it is in
5 handwriting.

6 Q. For what period of time do you have these
7 records?

8 A. The daily attendance I am not exactly
9 sure. Through the duration of time that I worked as a
10 housemom.

11 Q. Where are your records of that right now?

12 A. The dailies are kept at The Cheetah. They
13 are not my records.

14 Q. So Cheetah has those?

15 A. Yes, sir.

16 Q. They would have the three-year period
17 preceding April 9th, 2016?

18 A. To my knowledge.

19 MR. WARD: Off the record?

20 MR. DUDLEY: (Nods head.)

21 (Discussion off the record.)

22 Q. (By Mr. Dudley) So what does it -- have a
23 stage name -- I don't understand the print versus the
24 handwritten. You are saying there is a printed
25 schedule per shift.

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1 A. Yes.

2 Q. It is prepared in advance of the shift.

3 A. Yes.

4 Q. This is the way it has always been done?

5 A. Yes.

6 Q. So there has always been a printed
7 schedule for entertainers?

8 A. A printed daily, yes.

9 Q. And on that list, I can tell who is
10 covering and who is being covered because there will
11 be a handwritten name next to the name of the person
12 they are covering; is that right?

13 A. That is the way I do it. I strike through
14 the name of the person who was scheduled and then in
15 my handwriting write the name of the girl who is
16 actually to work the shift.

17 It will also show the people who requested
18 off.

19 Q. I will submit to you that you have
20 testified in the past in these cases that you have
21 testified that entertainers were not subject to
22 schedules. You are now telling me that you have
23 printed schedules for every shift.

24 A. They are not fired if they don't work
25 their scheduled day. But upon getting hired they are

1 asked to give three days a week to be scheduled.

2 Q. Are there any other documents that would
3 show me when somebody is covering or who is
4 covering --

5 A. I don't believe so.

6 Q. -- that Cheetah has.

7 And again, talking about the period prior
8 to April 9th, 2016, you agree with the statement that
9 Cheetah had a policy requiring their entertainers to
10 get a cover if they had an unexcused absence, right?

11 A. They are not required to get a cover.
12 They requested they get their shift covered for, like,
13 an unexcused reason.

14 Q. So your testimony today is that's not
15 Cheetah's policy?

16 A. That is Cheetah's policy that we request
17 them to have a cover, yes.

18 (Plaintiff's Exhibit 1 was marked for
19 identification.)

20 Q. (By Mr. Dudley) Do you recognize this
21 document?

22 A. Yes.

23 Q. Can you tell me what it is?

24 A. The Nightshift Entertainer Orientation and
25 Guidelines.

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1 Q. Go to Page 2. Go down to the fourth
2 bullet point under scheduling and attendance, the one
3 that starts if you cannot.

4 Yeah. That's the right bullet point.

5 If you could, go to the second paragraph
6 of that bullet point and read that to me, please.

7 A. If you have a valid reason for not making
8 your shift, you must provide documentation to your
9 housemom upon returning to work. If not, you must get
10 your shift covered by another entertainer who is not
11 scheduled for that shift.

12 Q. Does that change your testimony?

13 A. No. I understand that it says "must," but
14 I have never, I mean --

15 Q. "Must" is in bold and underlined, is it
16 not?

17 A. Correct. It is a guideline. We would
18 rather them work their shift.

19 Q. You think "must" is a guideline?

20 A. I think this document is a guideline.

21 Q. This is the document that for nightshift
22 dancers is given to them by the housemom and they are
23 told to adhere to it, are they not?

24 A. Yes, sir.

25 Q. I am going to show you this document.

1 Do you recognize that document?

2 A. Yes, sir.

3 Q. Is that Cheetah's policies and procedures
4 post April 9th, 2016?

5 A. I believe so. Yes.

6 Q. Please look at it and let me know.

7 A. It says revised April 2016. That's a yes.

8 Q. That's a document you give to new
9 entertainers post April 9th, 2016, right?

10 A. Yes.

11 Q. Could you read the part about attendance
12 on this document, please.

13 MR. WARD: Do I have a copy of that?

14 MR. DUDLEY: I don't have one.

15 MR. WARD: Where are we going, this
16 paragraph?

17 MR. DUDLEY: Attendance.

18 MR. WARD: Which paragraph is that on?

19 MR. DUDLEY: First page.

20 MR. WARD: Am I missing something?

21 MR. DUDLEY: Let me see it.

22 This is why I am not entering it as an
23 exhibit. I only have one copy.

24 First page, failure to report to work.

25 Q. (By Mr. Dudley) Could you please read

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1 that to me.

2 Q. All employees are required to report for
3 work according to their assigned schedules. If for
4 any reason an employee cannot report to work, the
5 employee must notify manager or housemom and make
6 arrangements for a substitute to cover her shift.

7 Is that a correct reading of Cheetah's
8 policy regarding covers post April 9th, 2016?

9 A. Yes.

10 Q. Thank you.

11 What is the purpose of Cheetah's cover
12 policy?

13 MR. WARD: Object to the form.

14 THE WITNESS: The Cheetah would like to
15 have entertainers working.

16 Q. (By Mr. Dudley) And they ensure that
17 happens by having a cover policy, do they not?

18 A. It is an option for the entertainer to
19 take a night off.

20 Q. Ensures if an entertainer takes a night
21 off that somebody is working for them, right?

22 A. In theory, yes.

23 Q. It is important enough that Cheetah
24 continues to use it even after entertainers are
25 designated employees, correct?

1 A. Yes.

2 Q. You would agree that entertainers make
3 good money at Cheetah?

4 A. Most entertainers, yes.

5 Q. And you would agree that many entertainers
6 make in excess of a thousand dollars a shift?

7 A. It is rare on my shift.

8 Q. Rare on dayshift. Tell me if I am wrong,
9 I remember in your testimony before you went to great
10 lengths to talk about how much money entertainers made
11 in tips. Do you recall that?

12 MR. WARD: Object to the form.

13 THE WITNESS: They make great money in
14 tips.

15 Q. (By Mr. Dudley) Do you think it is
16 unusual for a girl to make over a thousand dollars a
17 night in tips?

18 A. Unusual, no.

19 Q. It is quite common for an entertainer to
20 make \$500 a night, correct?

21 A. On nightshift, probably, yes.

22 Q. What about dayshift?

23 A. It can happen.

24 Q. Quite common?

25 A. Sure.

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1 Q. I understand all do not do it. But there
2 are a good number of entertainers who are making \$500
3 a shift, right?

4 A. With so many girls I can't give you a
5 percentage on that. Am I surprised to hear they have
6 a \$500 day, no.

7 Q. And you acknowledge that some entertainers
8 may make a thousand dollars a shift for VIP dancing,
9 correct?

10 A. Yes.

11 Q. And you would agree with the statement
12 that the entertainers made \$300 an hour doing VIP
13 dancing and it is not uncommon for entertainers to do
14 at least one VIP per shift, correct?

15 A. For girls that are regularly in VIP, yes.

16 Q. In dayshift entertainers are charged a
17 \$10-per-check-in fee?

18 A. Prior to April 9th, 2016?

19 Q. Yes.

20 A. Yes. It was \$10 per hour.

21 Q. Or 30 minutes, right?

22 A. Correct.

23 Q. What happened to those VIP check-in fees
24 at the end of the shift?

25 A. On dayshift?

18

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1 Q. Dayshift.

2 A. They went to the housemom and the DJ.

3 Q. So on dayshift you are telling me that VIP
4 check-in fees went to the housemom and the DJ rather
5 than to Cheetah?

6 A. Yes.

7 Q. Are any records kept of those?

8 A. No.

9 Q. Is there a particular reason why there are
10 no records?

11 A. Not to my knowledge.

12 Q. Can you explain to me why Cheetah would
13 keep records of that in the nightshift but not the
14 dayshift?

15 A. Because at nightshift it gets turned into
16 the club and dayshift it does not.

17 Q. The reason why records aren't kept is
18 because the housemom and the DJs get to keep the
19 check-in fees, correct?

20 A. It was part of the girls' checkout, yes,
21 including their tipout.

22 Q. Are those fees accounted for in any way by
23 Cheetah or you?

24 A. They don't go to Cheetah. They are
25 accounted for as my tips. But they are not --

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1 Q. Do you declare them as tips with Cheetah?

2 A. I am sorry?

3 Q. Do you declare the check-in fees as tips
4 with Cheetah?

5 MR. WARD: I think she is confused.

6 THE WITNESS: I am.

7 MR. WARD: I know she is confused. Can I
8 help? I can tell you what the problem is.

9 MR. DUDLEY: I will try to figure it out.

10 Q. (By Mr. Dudley) Let me ask you this, the
11 check-in fees, are they included as income on your tax
12 returns?

13 A. Yes.

14 Q. How are they included? Are they included
15 as tip income or is it because it is on a W-2 that
16 Cheetah gives you, or 1099?

17 A. It is not on a W-2. No. I report them as
18 previously unclaimed tips.

19 Q. Do you report the VIP check-in fees as a
20 tip?

21 A. It was a tip to me so yes.

22 Q. I am not asking you that. Do you report
23 it as a tip?

24 A. On my taxes?

25 Q. Yes.

1 A. Yes.

2 Q. You consider the mandatory fee paid by an
3 entertainer to be a tip to you?

4 A. At that time, yes.

5 Q. How did a DJ and housemom divide up the
6 VIP check-in fees?

7 MR. WARD: Object to form.

8 THE WITNESS: In half.

9 Q. (By Mr. Dudley) DJ got half, you got
10 half.

11 A. Correct.

12 Q. This time you're a house manager, right?

13 A. Housemom, yes.

14 Q. You were a daytime manager during this
15 period of time?

16 MR. WARD: Object to form.

17 THE WITNESS: I was daytime manager and
18 housemom.

19 Q. (By Mr. Dudley) Dayshift entertainers are
20 assessed a \$25 late fee for being late for their
21 shift.

22 MR. WARD: Object to the form.

23 THE WITNESS: No.

24 Q. (By Mr. Dudley) Are they not fined for
25 being late for shifts?

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1 A. The daytime fee was not \$25. And they
2 were very rarely fined.

3 Q. How much was it?

4 A. 15.

5 Q. So it is your contention that there was a
6 \$15 fine if someone is late to work, correct?

7 MR. WARD: Object to the form. Misstates
8 her testimony.

9 Q. (By Mr. Dudley) Tell me how your
10 testimony is different than that.

11 MR. DUDLEY: The answer or the question?

12 MR. WARD: The answer because you restated
13 the testimony.

14 MR. DUDLEY: I will withdraw it rather
15 than go through that process.

16 Q. (By Mr. Dudley) I am simply asking you
17 how much the fee was which I believe you testified was
18 \$15, right?

19 A. Yes.

20 Q. Is that a flat \$15 regardless of what time
21 they come in?

22 MR. WARD: I am going to object to the
23 form again.

24 THE WITNESS: I believe so. It has been
25 so long since I collected a late fee. I believe

1 on daytime it was only \$15.

2 Q. (By Mr. Dudley) It did not escalate?

3 A. No.

4 Q. Where did this money go?

5 A. To the first girl that was in the door.

6 Q. Tell me how that worked.

7 A. The first girl that checked in on the rare
8 occasions that we collected a late fee from someone
9 who arrived late to a scheduled shift, that late fee
10 was given to the first entertainer to arrive as
11 incentive for being on time.

12 Q. Let me see if I understand this. You
13 charged \$15. You personally collected it from the
14 entertainer at the end of the shift, right?

15 A. At the end of the shift or when she walked
16 in. Either way.

17 Q. And then you turned around and gave that
18 \$15 to who you claim was the first person that arrived
19 for shift, which I should be able to tell from the
20 sign-in sheets, right?

21 A. Well, at that time there wasn't a sign-in
22 timesheet but yes.

23 Q. What happened to the second \$15 that was
24 fined against someone?

25 A. It would go to the second girl.

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1 Q. You are telling me that went on and on.
2 You would fine and give that money back to another
3 girl, take a fine, give it back to the next one,
4 that's the way it went?

5 A. Yeah.

6 Q. There were no records of this?

7 A. (Witness shakes head.)

8 MR. WARD: I need a break.

9 (Recess from 2:10 p.m. to 2:12 p.m.)

10 Q. (By Mr. Dudley) We are back on the
11 record.

12 I want to sum up your testimony about late
13 fees, make sure I understand. Late fees go to you.
14 You purportedly give it back to the entertainers,
15 right?

16 A. I collect it and give it to the first one
17 who arrived, yes.

18 Q. Keep no records of it?

19 A. I don't believe so. There may be a couple
20 of designations on the dailies that say LT, but I am
21 not a hundred percent sure.

22 Q. I can determine who was paid late fees by
23 going, looking at people in the order they are checked
24 in?

25 MR. WARD: Object to the form.

1 THE WITNESS: Yes.

2 Q. (By Mr. Dudley) What's the policy of the
3 late fee you charged for dayshift? Why did you do
4 that?

5 A. To try to get girls to arrive on time for
6 their shift.

7 Q. The beneficiary of that was you
8 personally, correct?

9 A. I am not sure I understand.

10 Q. Well, you collected the money, right?

11 A. Yes.

12 Q. Do you contend that anybody benefited from
13 that other than you?

14 A. I didn't benefit from late fees.

15 Q. Did the club benefit from it?

16 A. No.

17 Q. I thought you just told me that that
18 encouraged people to come in earlier. Didn't you
19 testify to that?

20 A. Nonmonetarily, yes. The club would
21 benefit from having girls there on time.

22 Q. There is no way for me to prove the amount
23 of the late fee because Cheetah has no records of it,
24 right?

25 A. To my knowledge, I don't believe so, no.

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1 Q. When it was assessed, it was mandatory,
2 right?

3 A. I mean, do we say that you have to be on
4 time for your scheduled shifts, yes. Was every person
5 who ever arrived late charged a late fee, no.

6 Q. Were entertainers fined for missing stage
7 sets?

8 A. On the rarest occasion.

9 Q. How much was the fine?

10 A. I believe it was \$20. Again, it has been
11 so long since I collected it, I am not a hundred
12 percent.

13 Q. Was it not \$25 per the written policy?

14 A. I know it is \$25 on the nightshift.

15 Q. You can't remember what it was for
16 dayshift?

17 A. I believe it was 20. But again, it is a
18 fee I have rarely enacted.

19 Q. What happened to those fees?

20 A. Missed set fees would have been turned in
21 to the house if collected.

22 Q. Tell me how that worked. How would you
23 keep track of it? Who did it go to?

24 A. At the end of your shift you would put it
25 on a checkout form with the denomination of bills that

1 were used to pay and how much the total was, the day
2 it was collected. It would be turned into Cheetah
3 Bucks.

4 Q. Do you have records of those amounts that
5 were collected as missed stage fees?

6 A. I do not.

7 Q. Have you given any records to Cheetah?

8 A. I don't have any records. I don't have
9 anything to give them.

10 Q. The record you created was given to the
11 Cheetah Buck girl and after that you have no records
12 of it?

13 A. Correct.

14 MR. WARD: Object to the form.

15 Q. (By Mr. Dudley) Now, what was the purpose
16 of a missed stage fee?

17 A. To try to get girls to do their stage set.

18 Q. Who benefited from the payment of the fee?

19 A. I don't know.

20 Q. Whoever received it which in your
21 testimony I believe was the club; is that right?

22 A. Correct.

23 Q. They would be a beneficiary, would they
24 not?

25 A. Then yes.

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1 Q. They would be a monetary beneficiary and
2 they would also be a beneficiary of encouraging
3 dancers to make their stage sets, right?

4 A. Correct.

5 Q. What was the customary tipout to housemoms
6 for dayshift?

7 A. Before 2016, it was \$10.

8 Q. So that worked just like nightshift?

9 A. The \$10 housemom was the same, yes.

10 Q. That was something that you kept, right?

11 A. Yes.

12 Q. And that was a mandatory minimum of 10,
13 correct?

14 A. It was a suggested minimum of 10.

15 Q. And what was the floorman fee for
16 dayshift?

17 MR. WARD: Object to the form.

18 Q. (By Mr. Dudley) Pre April 9, 2016.

19 MR. WARD: Object to the form.

20 THE WITNESS: When I had a floorman, it
21 was a suggested \$5.

22 Q. (By Mr. Dudley) What period of time did
23 you not have a floorman?

24 A. It has been a couple of years since I had
25 one. I couldn't tell you exactly when.

1 Q. When you did not have a floorman, did you
2 take \$5 as a floorman fee?

3 A. No.

4 Q. Is there no security during the day?

5 A. I also play that role.

6 Q. Busy woman.

7 A. I am.

8 Q. Obviously you are a beneficiary of any
9 rule that would require an entertainer to tip a
10 housemom, right?

11 A. Yes. I am the housemom as well.

12 Q. How much was an entertainer expected to
13 tip a DJ during dayshift prior to April 9th, 2016?

14 A. I believe it was also \$10.

15 Q. You have personally reprimanded
16 entertainers for not tipping enough, have you not?

17 A. I don't believe so.

18 Q. Can you think of any circumstance why it
19 would justify you telling an entertainer she hadn't
20 tipped enough?

21 A. When I was working as a nightshift
22 housemom, if I knew someone spent three hours in VIP
23 and they wanted to give \$5 to their DJ, that's a sign
24 that I would ask them. But again, they were suggested
25 tipouts. It wasn't mandatory.

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1 Q. With respect to entertainers during
2 dayshift, do you have the power to hire entertainers?

3 A. In conjunction with Jack Braglia, yeah.

4 Q. Your recommendation makes a strong
5 influence on him.

6 MR. WARD: Object to the form.

7 THE WITNESS: I don't know how to answer
8 that.

9 Q. (By Mr. Dudley) You know Jack well. You
10 have hired dancers with him probably hundreds of
11 times. You know how to answer that, don't you?

12 MR. WARD: Object to form.

13 THE WITNESS: I don't know how much weight
14 my opinion comes to him that -- when it comes to
15 that. He has turned down lots of girls I would
16 have hired.

17 Q. (By Mr. Dudley) You give your opinion.
18 Sometimes he takes it, sometimes he doesn't, correct?

19 A. Correct.

20 Q. As dayshift manager or housemom, you have
21 the authority to reprimand, discipline dancers, right?

22 A. Yes.

23 Q. Does that authority extend to termination?

24 A. In a case of, like, in a very
25 black-and-white case, yes. In general, I always

1 consult Jack.

2 Q. You have the authority to do it in a clear
3 case but normally you run it by Jack. Is it safe to
4 say that's the way it is done?

5 A. Correct.

6 Q. You have the authority to send dancers
7 home, correct?

8 A. Yes.

9 Q. You have done that, correct?

10 A. Yes.

11 Q. You have done that for a multitude of
12 reasons, correct?

13 A. Correct.

14 Q. You did that when they didn't meet
15 Cheetah's appearance requirements, correct?

16 A. I have never hired anyone I had to send
17 home for not fitting our appearance, no.

18 MR. DUDLEY: I didn't ask you that.

19 (The record was read by the reporter.)

20 Q. (By Mr. Dudley) I am not asking whether
21 you hired somebody. You made some reference to hiring
22 in your answer. I am not asking if you hired someone
23 based on their appearance or lack of appearance.

24 I am asking you whether you sent somebody
25 home because they didn't satisfy Cheetah's appearance

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1 requirements.

2 MR. WARD: Object to the form.

3 THE WITNESS: The closest thing I can get
4 to that is sending someone to the boutique to buy
5 breakaways. But I have never sent anyone home.

6 Q. (By Mr. Dudley) You never sent anyone
7 home for the color of their hair?

8 A. I don't believe so, no.

9 Q. Never sent anybody home because you didn't
10 think the outfit was appropriate?

11 A. Absolutely not.

12 Q. Never sent anybody home because you didn't
13 feel appearancewise they weren't meeting Cheetah
14 standards?

15 A. No.

16 Q. You have witnessed entertainers getting
17 ready for work.

18 A. Yes.

19 Q. And you understand that entertainers put
20 on makeup, do their hair, nails, shave, do all these
21 things to dance. Do you understand that?

22 A. Yes.

23 Q. You have watched them do that, correct?

24 A. Uh-huh.

25 Q. Some of them take a long time to do it.

1 A. Was that a question?

2 Q. Yes.

3 A. Yes.

4 Q. Some of them take several hours to do it.

5 A. Yes.

6 Q. Do you agree that it is not unreasonable
7 for an entertainer to take an hour to get ready for
8 work?

9 A. I don't think it is unusual for any woman
10 to take an hour to get ready for work.

11 Q. Do you think it is an unreasonable amount
12 of time to get ready for work at The Cheetah, to take
13 an hour?

14 A. No.

15 Q. The dayshift ends at 8:00.

16 A. Yes.

17 Q. That's the same time the nightshift
18 begins.

19 A. Yes.

20 Q. Prior to April 9th, 2016, dayshift
21 entertainers had to go through a checkout process
22 after 8:00, correct?

23 A. Whenever their shift ends, yes.

24 Q. They are there at 8:00, they got to go
25 through a checkout process, right?

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1 A. Correct.

2 Q. Tell me what that involves.

3 A. They come off the floor and head to the
4 break room. This is prior to 2016. They come to the
5 break room. They would tip their DJ, tip their
6 housemom, pay any fees. Then they go to the
7 Breathalyzer, tip their floorman, Breathalyze, get
8 their slip and head out for the day.

9 Now without the floorman, they tip the DJ,
10 tip me, I Breathalyze them, they go home.

11 Q. If they haven't cashed in Cheetah Bucks
12 they have to do that at the end of the shift, too,
13 right?

14 A. Correct.

15 Q. How do entertainers leave during a
16 shift -- I am talking about when they are driving
17 their own vehicles -- how do they leave that is any
18 different from somebody leaving after the nightshift?
19 Does that make sense to you?

20 A. I am not sure I understand the question.
21 They get their ticket. They get their car if they
22 drove or wait on their ride and exit the property.

23 Q. Why at night is it Cheetah's policy to
24 have the lot cleared before they are allowed to leave
25 but it is okay for them to leave in the dayshift

1 without the lot being cleared?

2 A. I don't know.

3 Q. Can you think of any reason why things
4 would be different?

5 MR. WARD: Object to the form.

6 THE WITNESS: We don't ask all of our
7 customers to leave when one shift leaves.

8 Q. (By Mr. Dudley) Is there more security
9 around --

10 A. Security is coming on.

11 Q. -- at 8:00 o'clock than there would be at
12 3:30 or 3:00 o'clock or is it the same?

13 A. I believe it is the same amount of
14 floormen. There are probably more valets during shift
15 change.

16 Q. How long does it take to go through the
17 checkout process on a normal day?

18 A. Just a few minutes.

19 Q. What if there are lines?

20 MR. WARD: What if what?

21 Q. (By Mr. Dudley) What if there are lines?

22 A. Everybody is hustling. We have two
23 Breathalyzers. The line is not going to take long
24 when I have 12 girls working.

25 Q. You have one person checking out how many

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1 girls on your normal dayshift?

2 A. Twelve to 18.

3 Q. A lot of times it is more than that, isn't
4 it?

5 MR. WARD: Object to form.

6 THE WITNESS: Not lately.

7 Q. (By Mr. Dudley) One person doing a
8 Breathalyzer, collecting all the fees and fines,
9 collecting money for the DJ, collecting money for the
10 housemom, collecting money for the floorman, the
11 dancer going through the -- cashing out the Cheetah
12 Bucks, all these kind of things you do in a couple of
13 minutes?

14 A. At the time you are talking about, there
15 were three people collecting the fees. There was the
16 DJ collecting for himself, the floorman collecting his
17 and Breathalyzing them and me collecting fines.

18 Q. It wouldn't take a couple of minutes to
19 Breathalyze one person?

20 A. No. It takes about 30 seconds to
21 Breathalyze one person, maybe 45.

22 Q. The prior witness testified that you were
23 given a sheet indicating who had cover and who was
24 covering them for nightshift. Is that true?

25 MR. WARD: Object to the form.

1 THE WITNESS: That the nightshift
2 housemoms turn in weekly attendance to me, yes,
3 they do.

4 Q. (By Mr. Dudley) On that document -- I am
5 referring to the document she has talked about that I
6 will represent to you I have never seen because it has
7 never been given to me. But it is my understanding
8 that her testimony said that will show who had a cover
9 and who covered, right?

10 A. Yes.

11 Q. What happens to that document after it is
12 given to you?

13 A. Filed in a binder.

14 Q. Where is that binder?

15 A. In the office.

16 Q. The office at Cheetah?

17 A. Yes.

18 Q. This is something kept on a nightly basis?

19 A. Yes. It is a daily sheet. They turn it
20 in weekly.

21 Q. Cheetah has always maintained those
22 records to your knowledge?

23 A. To my knowledge, yes.

24 Q. You would agree with the statement that
25 the best way to determine a dancer's schedule before

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1 April 9th, 2016, is to look at their entertainer info
2 sheet?

3 A. For the first schedule that she set, sure.

4 Q. Schedule change would be another info
5 sheet, wouldn't there?

6 A. It would change on the housemom's dailies.

7 Q. So the daily documents, again, would show
8 me what people's schedules were.

9 A. It will show you who was scheduled that
10 day, yes.

11 Q. Wouldn't show what their schedule is,
12 though, would it, or it would?

13 A. It is just one day. It would show who is
14 scheduled for that day.

15 Q. Do you know any of the entertainers I
16 represent?

17 A. Have I met them before or could I name
18 them?

19 Q. I am sure you have met them. Do you know
20 who some of them are for dayshift?

21 A. I don't know specifically who is
22 represented by who. But I have a good grasp on who is
23 involved.

24 Q. Can you tell me who you think is involved?
25 It is not a lot of dayshift people, I don't think, is

1 it?

2 A. No. There are several that have worked
3 day and night. I am not really sure who is
4 represented by what attorney.

5 Q. Doesn't matter. Just tell me the ones you
6 remember.

7 A. Amica Jolly. Heather Legget. Jacqueline
8 Hutsell. Miriam Adams. Summer Angie. No. Sara
9 Angie. Stephanie Waggoner. Katherine Kahn. Those
10 are the ones that are coming to me right now.

11 Q. With respect to Hutsell, Adams, Angie, and
12 Waggoner, do you remember what they typically earned a
13 night or a day?

14 A. I am sorry, I don't.

15 Q. Do you have any recollection of --

16 A. Sara Angie was a pretty successful
17 entertainer.

18 Q. I want to talk to you a little bit about
19 after April 9th, 2016.

20 How did entertainers on dayshift, how did
21 their compensation change?

22 A. Other than now getting two thirteen from
23 the club an hour, it did not change.

24 Q. It is your understanding the club paid
25 them two thirteen an hour then the club utilized the

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1 tip credit for the remaining five twelve an hour
2 minimum wage; is that your understanding?

3 A. I am not familiar with the tip credit.
4 But we do ask the girls to claim their tip credit to
5 make sure they satisfy their minimum wage.

6 Q. Is that what you tell them?

7 A. I tell them they need to claim their tips
8 at the end of the shift.

9 Q. How much do you tell them to claim?

10 A. What they made. I don't really tell them
11 to claim anything.

12 Q. You don't tell them to claim \$80 or claim
13 enough to cover the minimum wage obligation?

14 A. \$80 is an example that I give as, you
15 know, if you are an average entertainer, you work
16 three shifts, you are claiming \$80, that's only
17 \$12,000 at the end of the year. That's not realistic
18 for most of our girls.

19 Q. But it is enough to cover the minimum wage
20 obligation tipwise on the shift, right?

21 A. I believe so, yes.

22 Q. Entertainers' tipouts changed post April
23 9th, 2016, right?

24 A. Correct.

25 Q. And tell me how the tipouts changed from

1 the way it was before that date.

2 A. There is now just a 10 percent
3 contribution to a tip pool that on dayshift goes to
4 the DJ.

5 Q. What are housemoms tipped? Nothing?

6 A. Housemoms do not even have a suggested tip
7 now.

8 Q. They now have a bucket?

9 A. Right.

10 MR. WARD: Excuse me. I can't hear you.

11 Q. (By Mr. Dudley) They now have a bucket?

12 A. I believe so. Yes. I use a bucket.

13 Q. Before there was not a bucket, was there?

14 A. On nightshift I think there has always
15 been a bucket. On dayshift before, no.

16 Q. The 10 percent is based upon the
17 entertainer's income or tips for the shift, right?

18 A. Yes.

19 Q. The figure that is used to calculate 10
20 percent may not be the same amount as declared by the
21 entertainer, correct?

22 A. I am sorry. Repeat it, please.

23 Q. The tip pool is based upon 10 percent of
24 an entertainer's tips for the shift, correct?

25 A. Correct. It should be 10 percent of what

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1 they earned that day.

2 Q. That may not be the same figure when an
3 entertainer declares tips for that same shift,
4 correct?

5 MR. WARD: Object to form.

6 THE WITNESS: I don't know what they
7 declared.

8 Q. (By Mr. Dudley) If they declared 80, for
9 example, and paid 10 percent of a thousand, you are
10 certainly going to know. If their 10 percent is a
11 hundred dollars for the night, you are certainly going
12 to know that the \$80 figure is not the actual tips,
13 right?

14 A. Yes. One would know that. But I don't
15 watch them key in their tips.

16 Q. I guess what I am saying to you is the 10
17 percent is not based upon the amount they declare as
18 tips. It is based upon the amount they earned as
19 tips, right?

20 A. I don't know what they declare as tips.
21 It is based on what they tell us they earned.

22 Q. Cheetah's policy is it is 10 percent of
23 the amount they earned is tips if they tipout,
24 correct?

25 A. Correct.

1 Q. And you leave it up to the entertainer to
2 allocate whatever she wants in tips as long as it
3 meets the minimum wage obligation, correct?

4 MR. WARD: Object to form.

5 THE WITNESS: We rely on the entertainers
6 to report their tips.

7 Q. (By Mr. Dudley) You could keep track of
8 both of those figures to make sure that they are the
9 same, could you not?

10 A. I don't see what they put into the
11 computer.

12 Q. But you could keep track of the -- since
13 you are basing it on a percentage of what they make,
14 you could have accurate amounts, correct?

15 A. I don't receive that 10 percent. So you
16 keep saying I. I am not a part of that 10 percent.

17 Q. But Cheetah could.

18 A. Cheetah is not a part of that 10 percent,
19 either. It goes to the DJ.

20 Q. Well, somebody is taking the 10 percent
21 that works for Cheetah, right?

22 A. Yes.

23 Q. So it is a Cheetah tip pool arrangement,
24 right?

25 A. Yes.

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1 Q. I think we already established that the
2 cover policy continued after April 9th, 2016, right?

3 A. Yes. Girls continued to take nights off.

4 Q. You have been involved in covering,
5 correct?

6 A. Have I? Has someone dropped off money to
7 me to give to someone else, yes.

8 Q. Not only that, on each shift you know who
9 is getting a cover and who is covering, right?

10 MR. WARD: Object to the form.

11 THE WITNESS: You do your best. You don't
12 always know. You do your best.

13 Q. (By Mr. Dudley) Do you keep records of
14 it?

15 A. We keep records of who worked, yes.

16 Q. You keep records of who covered and who
17 was covered, right?

18 A. Who either requested off or who was
19 covered, yes. When you say -- there is not a separate
20 list. It is on the daily.

21 Q. But it shows those two things.

22 A. Yes.

23 Q. Entertainers pre and post April 9th, 2016,
24 are expected to pay for their permits out of the tips
25 they earn working for Cheetah, correct?

1 A. They are expected to pay for their
2 permits. They have to have one before they start. I
3 don't know if I would say they are expected to pay it
4 from their tips. They are expected to buy their
5 permits.

6 Q. Are you aware of any entertainer who did
7 not -- that I represent who did not buy a permit the
8 week she started working for Cheetah?

9 A. I am not aware of anyone who has ever
10 worked for the Cheetah without a permit.

11 Q. You can just answer my question yes or no.
12 You can explain if you want.

13 A. I don't think anyone has worked without a
14 permit. The club has loaned money to entertainers
15 so --

16 MR. WARD: He wants to know if you know if
17 any of his clients got a permit within a week
18 after being hired.

19 Q. (By Mr. Dudley) The workweek they were
20 hired. That's all I am asking.

21 A. Sure.

22 Q. You know that to be the case?

23 MR. WARD: I think now we got it cleared
24 up, ask the question again.

25 Q. (By Mr. Dudley) I am only asking you

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1 about the people I represent.

2 A. Okay.

3 Q. You know some of them. The ones you are
4 aware of, can you tell me whether any of them didn't
5 get a permit during the workweek they started working?

6 A. If they were working they had a permit.

7 Q. You don't know when they bought it, the
8 permit, the week they started working, do you?

9 A. Off the top of my head, no.

10 Q. If somebody renewed a permit while they
11 were working at Cheetah, obviously they would purchase
12 that permit during a workweek they were working for
13 Cheetah, more than likely?

14 A. Yes.

15 Q. And that would be paid out of their tips
16 as far as you know.

17 A. Yes.

18 Q. And who else has to have a permit to work
19 at Cheetah? Waitresses do?

20 A. Yes.

21 Q. Bartenders do?

22 A. Yes.

23 Q. Entertainers do?

24 A. Yes.

25 Q. Do you?

1 A. Yes.

2 Q. So management does, too?

3 A. Yes.

4 Q. Housemoms, too?

5 A. Yes. Kitchen, bathroom employees.

6 Q. Does Jack?

7 A. Yes.

8 Q. What about a cook in the kitchen?

9 A. Yes.

10 My bathroom attendants.

11 Q. Is there anybody at Cheetah that you are
12 aware of that doesn't have to buy a permit?

13 A. No.

14 MR. WARD: Which is why y'all's letters
15 always go to Jack.

16 MR. DUDLEY: I don't even know what you
17 are talking about. I think you are talking about
18 somebody else. We won't get into that.

19 Q. (By Mr. Dudley) As far as you know,
20 that's the way the statute reads. Everybody that
21 works with the Cheetah has to get a permit.

22 MR. WARD: Object to the form.

23 Q. (By Mr. Dudley) Just your understanding
24 of it.

25 MR. WARD: That's fine. You can give your

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1 understanding.

2 THE WITNESS: Yes.

3 Q. (By Mr. Dudley) Does Cheetah pay for
4 anyone's permits?

5 A. I think we pay for our kitchen guys'
6 permits.

7 Q. Do you know why that is?

8 A. I do not.

9 MR. WARD: She can ask questions if you
10 want her to. I don't care.

11 MR. DUDLEY: No.

12 I think that is going to be it. Give me
13 about five minutes. I will let you know.

14 MR. WARD: Let me cover this on the
15 record. It seems to be an issue. As soon as I
16 get confidentiality orders signed by everybody,
17 we will be releasing these documents that you
18 keep saying you haven't been getting.

19 MR. DUDLEY: I would love you to put on
20 the record exactly what I am going to get. I
21 would love for you to do that. That may have
22 something to do with whether we can speed up the
23 protective order issue. Some of them we have
24 already signed orders that ought to cover this.

25 MR. WARD: Just one. And everybody --

1 MR. DUDLEY: We got more than one.

2 MR. WARD: Well, which ones?

3 MR. DUDLEY: I think the collective there
4 is a protective order, isn't there?

5 MR. WARD: No. I sent you the Title VII
6 one.

7 MR. DUDLEY: I know there is in the Gepp
8 case. I know that in Chris Berney's cases they
9 were entered early. I mean, it would help me.

10 I have two issues with the protective
11 order. One is that it covers documents that have
12 already been produced. Some discovery periods
13 are over with. I think it is frankly just not
14 appropriate to go back and make everything you
15 have given to me or anyone else subject to a
16 confidentiality order.

17 Second, I have a real concern about doing
18 a confidentiality order that is going to forbid
19 me from going over certain documents with my
20 clients. It prevents me from preparing for my
21 case. If I knew what the documents were, I could
22 tell you whether I would approve of them being
23 attorneys' eyes only. Otherwise I don't want to
24 get in a fight every time I want to show a
25 document to my client. It intrudes into the

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1 attorney-client relationship. I just hope you
2 understand the position on that.

3 MR. WARD: I am just saying as soon as you
4 sign it, you can have it. You can have all the
5 positions in the world.

6 MR. DUDLEY: What you have given me hasn't
7 addressed my concerns, okay?

8 MR. WARD: That one was reviewed by
9 Mr. Gepp over your objections, entered as we
10 prepared it. I am saying we will do the same one
11 in every case right now, this second.

12 How many documents have been marked
13 attorneys' eyes only? Some financial documents?
14 Has any document --

15 MR. DUDLEY: The ones you are giving to me
16 are attorneys only. The Gepp one is attorneys'
17 eyes only.

18 MR. WARD: No. It has two designations.
19 We have to designate it for it to be attorneys'
20 eyes only. I would like you to show me what
21 documents we have designated as attorneys' eyes
22 only. Look at the order. I think you are
23 misunderstanding me.

24 MR. DUDLEY: Are you telling me the
25 documents I am about to get are not attorneys'

1 eyes only?

2 MR. WARD: I don't know the answer.

3 MR. DUDLEY: Why are we even having this
4 argument if they aren't?

5 MR. WARD: About what?

6 MR. DUDLEY: About attorneys' eyes only.

7 MR. WARD: About a category of attorneys'
8 eyes only?

9 Q. (By Mr. Dudley) If they don't exist, why
10 are we --

11 MR. WARD: There will be some documents
12 that will have attorneys' eyes only. They are
13 most likely to be financial documents of the club
14 which we don't want to send to all the employees.
15 You represent the employees. But we feel like it
16 would be helpful for both sides for you to see
17 those.

18 I don't want my employees seeing tax
19 returns for my -- that's the sort of document
20 that I contemplate being attorneys' eyes only.
21 Schedules and stuff like that, I don't care about
22 that stuff being attorneys' eyes only. I really
23 don't.

24 And, for example, we do not want you
25 sharing disciplinary records of one girl with

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1 another girl. That would be unfair to the girl
2 that got disciplined, right?

3 MR. DUDLEY: I don't know about that. I
4 don't know whether I would agree with you there.
5 Unfortunately, these girls may have a right to
6 know that.

7 Now, I will do everything I can do to
8 protect the girl who was disciplined. I don't
9 think we can say -- they may have knowledge about
10 it. They may be able to confirm that it
11 happened.

12 MR. WARD: I would suggest to you you get
13 into circumstances among other things which might
14 be a conflict. But you can find -- it is
15 incumbent on you to decide if you are going to
16 tell a girl another girl got disciplined.

17 We would say this is confidential, don't
18 share it with people -- in other words, people
19 that are not your clients that got disciplined,
20 it is none of your client's business who got
21 disciplined.

22 It may be their business if other girls
23 unnamed, unidentified were disciplined but I
24 really think that has to go in front of the
25 judge. These girls, they will take things out on

1 each other.

2 You know exactly what I am talking about
3 here. They will start catting on each other and
4 being mean to each other and talking about each
5 other in the workplace.

6 It will create a terrible environment for
7 them if you tell your clients about all the
8 disciplinary actions of other girls. That's my
9 concern. It is for them.

10 MR. DUDLEY: Well, I will certainly -- not
11 knowing what you are going to give me and the
12 circumstance of it being produced, you have to
13 understand my position on all of this.

14 MR. WARD: I don't. I think what you are
15 doing --

16 MR. DUDLEY: You ought to because I think
17 any lawyer would appreciate the fact that giving
18 something four years later is probably not a
19 timely response to production.

20 MR. WARD: In your position, I would get
21 the documents. If I felt like the other side
22 improperly designated them, I would be right in
23 front of the judge.

24 MR. DUDLEY: That may happen.

25 MR. WARD: That's fine.

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1 MR. DUDLEY: Let's finish this deposition,
2 then I will be happy to talk to you about it.

3 (Recess from 2:51 p.m. to 3:03 p.m.)

4 (Deposition concluded at 3:03 p.m.)

5 (Pursuant to Rule 30(e) of the Federal
6 Rules of Civil Procedure and/or O.C.G.A.

7 9-11-30(e), signature of the witness has been
8 reserved.)
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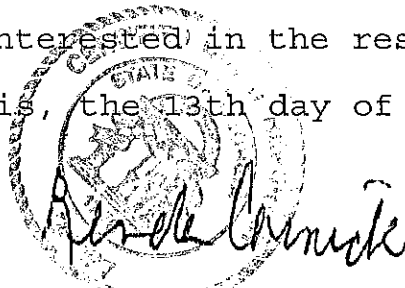
C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 53 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 13th day of November, 2017.



RENDA K. CORNICK, CCR-B-909

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2
3 Pursuant to Article 10.B of the Rules and
4 Regulations of the Board of Court Reporting of the
5 Judicial Council of Georgia, I make the following
6 disclosures:

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13 Dudley, Esq., to provide court reporting services for
14 this deposition.

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17 O.C.G.A. 15-14-37 (a) and (b).

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Renda K. Cornick, CCR-B-909
October 30, 2017

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WSG Reporting, LLC, is not disqualified for a relationship of interest under the provisions of O.C.G.A. 9-11-28(c).

WSG Reporting, LLC, was contacted by the offices of Ainsworth Dudley to provide court reporting services for this deposition.

WSG Reporting, LLC, will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b).

WSG Reporting, LLC, has no exclusive contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition.

WSG Reporting, LLC, will charge its usual and customary rate to all parties in the case and a financial discount will not be given to any party to this litigation.

This the 16th day of November, 2017.



FIRM REPRESENTATIVE
WSG Reporting, LLC

1 DEPOSITION OF: SAMANTHA LEIGH KIM/RKC

2 I do hereby certify that I have read all
3 questions propounded to me and all answers given by me
4 on October 30, 2017, taken before Renda K. Cornick,
5 and that:

- 6 1) There are no changes noted.
7 2) The following changes are noted:

8 Pursuant to Rule 30(e) of the Federal Rules of
9 Civil Procedure and/or the Official Code of Georgia
10 Annotated 9-11-30(e), both of which read in part: Any
11 changes in form or substance which you desire to make
12 shall be entered upon the deposition...with a
13 statement of the reasons given...for making them.
14 Accordingly, to assist you in effecting corrections,
15 please use the form below:

16 Page No. Line No. should read:

17 Page No. Line No. should read:

18 Page No. Line No. should read:

19 Page No. Line No. should read:

20 Page No. Line No. should read:

21 Page No. Line No. should read:

22 Page No. Line No. should read:

23 Page No. Line No. should read:

24 Page No. Line No. should read:

25 Page No. Line No. should read:

1 DEPOSITION OF: SAMANTHA LEIGH KIM/RKC

2 Page No. Line No. should read:

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6 Page No. Line No. should read:

7 Page No. Line No. should read:

8 Page No. Line No. should read:

9 Page No. Line No. should read:

10 If supplemental or additional pages are necessary,
11 please furnish same in typewriting annexed to this
12 deposition.

13
14 SAMANTHA LEIGH KIM

15 Sworn to and subscribed before me,
16 This the day of , 20 .

17 Notary Public
18 My commission expires:
19
20
21
22
23
24
25

AMENDED CERTIFICATE

STATE OF GEORGIA

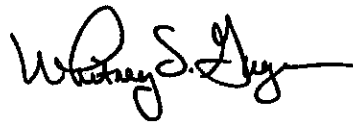
COUNTY OF GWINNETT

IN RE: ALISON VALENTE, JENNIFER BARLOW, KATHRYN
MONROE, SOPHIA SMITH, STEPHANIE LEBEAU on behalf
of themselves and all others similarly situated,
v.
INTERNATIONAL FOLLIES, INC. et al

WITNESS: SAMANTHA LEIGH KIM

I hereby certify that in addition to the certification made on Page 54
of the transcript, the more than thirty (30) days provided the witness to read
and sign the original transcript has expired. Therefore, the original is being
filed without signature of the witness.

This the 10th day of January, 2018



Whitney S. Guynes, CCR - B-1897

